



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

271 Cadman Plaza East
Brooklyn, New York 11201

December 3, 2021

By Email, USAFx and FedEx

Kevin K. Tung
c/o Kevin Kerveng Tung PC
136-20 38th Avenue, Suite 3D
Flushing, New York 11354

Re: United States v. Yong Zhu
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Interview of co-conspirator, dated April 12, 2017	YZ-004327	YZ-004328
Interview of co-conspirator, dated November 9, 2017	YZ-004329	YZ-004343
Interview of co-conspirator, dated June 21, 2018	YZ-004344	YZ-004345
Statements made by co-conspirator on or about October 28, 2020	YZ-004346	YZ-004350
Recordings of statements made by co-conspirator on or about October 28, 2020	YZ-004351	YZ-004351
Google data and records	YZ-004352	YZ-004352

Description	Begin Bates	End Bates
Apple iCloud data and records ¹	YZ-004353	YZ-004353

Due to the volume of data, we will be producing a portion of these materials via hard drive through the mail.

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers all of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
Ellen H. Sise
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)

¹ Some of this data has been previously produced to you, and is being reproduced for your convenience.